

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY, SHARON  
HAMMONDS, BRENDA F. WATKINS,  
LIMESTONE UNIVERSITY, MG,  
FREESITES, LTD., d/b/a PORNHUB.COM,  
MG FREESITES II LTD., MINDGEEK  
S.A.R.L., MINDGEEK USA, INC., MG  
BILLING LTD., and HAMMY MEDIA LTS.  
d/b/a XHAMSTER.COM, TRAFFICSTARS  
LTD., WISEBITS LTD., XHAMSTER IP  
HOLDINGS LTD., WISEBITS IP LTD.,

Defendants.

Civil Action Number: 7:20-cv-00947-DCC

**APPLICATION/AFFIDAVIT  
*PRO HAC VICE ADMISSION***

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A  
LIMESTONE COLLEGE, COLLINS MURPHY,  
MG FREESITES, LTD., D/B/A  
PORNHUB.COM, and HAMMY MEDIA LTD.  
d/b/a XHAMSTER.COM,

Defendants.

CASE NO.: 7:21-cv-03193-DCC

**APPLICATION/AFFIDAVIT  
*PRO HAC VICE ADMISSION***

JANE DOE 1, JANE DOE 2, JOHN DOE 1, and  
JOHN DOE 2,

Plaintiffs,  
v.

COLLINS MURPHY; LIMESTONE  
UNIVERSITY; BRENDA F. WATKINS;  
SHARON HAMMONDS; and MG FREESITES,  
LTD. D/B/A PORNHUB.COM,

Defendants.

CASE NO. 7:22-CV-03576-DCC

**APPLICATION/AFFIDAVIT  
*PRO HAC VICE ADMISSION***

(1) Name: Thomas \_\_\_\_\_  
First \_\_\_\_\_ Middle \_\_\_\_\_ Last \_\_\_\_\_

(2) Residence. I reside in the following state: California  
If a South Carolina resident, indicate months/years of residence: \_\_\_\_\_

(3) Business Address. I am an attorney and practice law under the name of or as a member of the  
following firm:

Firm name: Quinn Emanuel Urquhart & Sullivan, LLP

Mailing address: 865 S. Figueroa St., 10<sup>th</sup> Floor

City/State/Zip Los Angeles, CA, 90017

Telephone number: (213) 443-3000

Facsimile number: (213) 443-3100

E-mail address: thomasnolan@quinnmanuel.com

(Application will not be considered without an e-mail address to receive electronic notification.)

(4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to  
comply with the applicable statutes, laws, and rules of the State of South Carolina, with all  
applicable federal statutes, laws, and rules, including Local Rules of the United States District  
Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local  
Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the  
District of South Carolina in all matters of attorney conduct.<sup>1</sup>

(5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the  
District of Columbia or the State of California where I regularly practice law. **Attached is my  
certificate of good standing.**

(6) Additional Bar Membership. I have been admitted to practice before the following courts: (List all  
of the courts Applicant has been admitted to practice before: United States District Courts; United  
States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other

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<sup>1</sup>This District maintains a web site ([www.scd.uscourts.gov](http://www.scd.uscourts.gov)) from which the federal and local rules  
of procedure and related materials may be obtained.

states or the District of Columbia.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

Court	Date Admitted	Good Standing		
State Bar of New York	4/14/2011	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
U.S. Court of Appeals_Sixth Circuit	7/8/2011	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
U.S. Court of Appeals Ninth Circuit	11/16/2020	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
U.S. District Court, Northern District of California	3/13/2006	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
U.S. District Court, Central District of California	11/05/2009	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
U.S. District Court, Southern District of New York	8/13/2012	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

- (7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures?

Yes  No

(If "yes," give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)

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- (8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?

Yes  No

(If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

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- (9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?

Yes  No

(If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

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- (10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?

Yes  No

(If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

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- (11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?

Yes  No

(If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

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- (12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

TURNER, PADGET, GRAHAM AND LANEY, P.A.  
Post Office Box 1473  
Columbia, South Carolina 29202  
facsimile | 803-400-1542

Mark B. Goddard | Attorney ID: 09194  
email | mgoddard@turnerpadget.com  
direct | 803-227-4334

J. Kenneth Carter | Attorney ID: 05108  
email | kcarter@turnerpadget.com  
direct | 864-552-4611

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

- (13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.
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- (14) Application Fee. I affirm that the application fee of three hundred and fifty dollars (\$350) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.
- (15) Electronic Notification. By submitting this application, I consent to electronic notification.
- (16) Represented Party/Parties. I seek to represent the following party/parties: MG Freesites, LTD., MG Freesites II LTD., MindGeek S.A.R.L., MindGeek USA, Inc., MG Billing LTD.
- (17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.

*Thomas Nolan*

Signature of Applicant

**Sworn to and subscribed before me**  
this 16th day of October, 2023.

  
A Notary Public  
of the State of Virginia, County of Henrico

My Commission expires: 06/30/2025  
Notarized online using audio-video communication

